

JUL 1 8 2019

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WRITER'S EMAIL: igoines@ccmpt.com

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ORANGE COUNTY

LOS ANGELES

SAN FRANCISCO

SACRAMENTO

FRESNO

July 15, 2019

VIA FACSIMILE & U.S. MAIL

(866) 819-6169

lana Zadneprovskaja Farber & Co. 333 Hegenberger Road, Suite 504 Oakland, CA 94621

Re:

Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC

WCAB No:

ADJ12031731

Claim No:

040519008736

Case Status: Off Calendar

Dear Ms. Zadneprovskaia:

As you know, you proceeded to obtain replacement Panel Qualified Medical Evaluator list number 2425340 dated June 25, 2019 and proceeded to strike Dr. Mohan Nair from that list.

I kindly thank you for emailing me the list as well as your strike.

At this time, please note Defendants' strike of Dr. Ernest Cheng. That leaves the parties with Dr. Jorge Kim. Please proceed to set that evaluation and then serve notice.

As noted in my email on July 3, 2019, I kindly request that you forward me the evaluation notification once set. If I do not receive that notice giving me a reasonable amount of time to draft an advocacy letter. I will object to the evaluation going forward and will be sure to write to Dr. Kim indicating that Defendants will not set the evaluation because of the failure to properly notify Defendants of the date of the exam. I certainly hope that is not the case and thus, I do request that you forward me the notification for the PQME as soon as it is set.

Thank you for your attention in this matter.

Kindest Regards,

COLANTONI, COLLINS, MARREN, PHILLIPS & TULK, LLP

BY:

JAMES J. GOINES

JJG/skb

Encl:

PQME List No. 2425340 Striking Dr. Ernest Cheng

CC:

Mario Castro / Chubb Group of Insurance Companies

wcclaimsw2@chubb.com



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ORANGE COUNTY LOS ANGELES

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July 15, 2019

Dr. Jorge Kim 11010 White Rock Road, Suite 120 Rancho Cordova, CA 95670

Re:

Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC

WCAB No:

ADJ12031731

Claim No:

040519008736

Case Status: Off Calendar

Dear Dr. Kim:

Please be advised this office represents Defendants in the above-referenced matter.

Enclosed herein please find the Panel Qualified Medical Evaluation list dated June 25, 2019. Applicant's attorney proceeded to strike Dr. Mohan Nair and Defendants struck Dr. Cheng.

As such, you are the remaining doctor and per the Labor Code, Applicant's attorney will proceed to set that evaluation. Please note that, as made clear to Applicant's attorney, if his office does not provide Defendants with a reasonable amount of time to draft their advocacy letter after the evaluation is set with your office, Defendants will object to that evaluation going forward.

Thank you kindly for your attention to this matter, Dr. Kim. The parties look forward to your reporting.

Kindest Regards,

COLANTONI, COLLINS, MARREN, PHILLIPS & TULK, LLP

BY:

JAMES J. GOINES

JJG/skb

Encl:

Copy of PQME List No. 242530

CC:

Mario Castro / Chubb Group of Insurance Companies

wcclaimsw2@chubb.com

lana Zadneprovskaja, Esq. / Farber & Co.

State of California

DIVISION OF WORKERS' COMPENSATION

Department of Industrial Relations

INJURED WORKER INFORMATION

Panel #: 2425340

Date Request Received:

06/06/2019

Date Issued:

06/25/2019

No. of Req:

2

Claim No(s):

7173815490

Date(s) of Injury:

02/15/2019

Employer:

CARDIONET LLC

用M 2 3 海阳

Ins./Adj. Agency:

MARIO CASTRO

CHUBB GROUP LOS ANGELES

PO BOX 30850

LOS ANGELES CA 90030

To: IANA ZADNEPROVSKAIA - APP ATTY

FARBER OAKLAND

333 HEGENBERGER RD STE 504

OAKLAND, CA 94621

Employee:

JONATHAN SHOCKLEY

SELECTED QUALIFIED MEDICAL EVALUATOR PANEL:

[] PHYSICIAN'S NAME

ADDRESS

ERNEST Y, CHENG, DO

170 SANTA CLARA AVE STE 101

OAKLAND CA 94610 Pain Medicine

Tel No.:

(800) 858-5447

Tel Nor: (562) 495-3937

Tel No.: (510) 208-4700

SPECIALTY

YEARS IN PRACTICE

PHYSICIAN'S EDUCATION

MIDWESTERN UNIVERSITY ARIZONA COLLEGE, GLENDALE, AZ

Degree awarded in 2002

PHYSICIAN'S TRAINING

ROTATING-MESA GENERAL HOSPITAL, MESA, AZ, 2002-2003

PHYS. MED. & REHAB.-RUSH UNIVERSITY MEDICAL CENTER, CHICAGO, IL, 2003-2006

[] PHYSICIAN'S NAME

ADDRESS

MOHAN S. NAIR, MD

1101 MARINA VILLAGE PKWY STE 201

ALAMEDA CA 94501

SPECIALTY Pain-Medicine YEARS IN PRACTICE Thirty-Seven

PHYSICIAN'S EDUCATION

UNIVERSITY OF BOMBAY, BOMBAY INDIA

PHYSICIAN'S TRAINING

Degree awarded in 1977 SURGERY-SCARED HEART HOSPITAL, ALLENTOWN, PA, 1977-1978

PSYCHIATRY-UNIVERSITY OF CALIFORNIA IRVINE RVINE, CA, 1978-1981 CHILD PSYCHIATRY-HARVARD UNIVERSITY, BOSTON, MA, 1981-1983

[] PHYSICIAN'S NAME

ADDRESS SPECIALTY JORGE S. KIM, MD

2000 EMBARCADERO STE 200

OAKLAND CA 94606-5300

Pain Medicine

YEARS IN PRACTICE

Seven

PHYSICIAN'S EDUCATION

Degree awarded in 2008

PHYSICIAN'S TRAINING

UNIVERSITY OF CALIFORNIA DAVIS SCHOOL OF MED, SACRAMENTO, CA

PHYS MED & REHAB-UNIVERSITY OF CALIFORNIA DAVIS, SACRAMENTO, CA, 2008-2009 PHYS MED & REHAB-UNIVERSITY OF CALIFORNIA DAVIS, SACRAMENTO, CA, 2009-2012

QME Form 107(rev. February 2009)